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May 31, 2019

BY ECF

Honorable LaShann DeArcy Hall
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11211

Re: Cortes v. Musa,
14-CV-3014 (LDH) (RML)

Your Honor:

I am a Senior Counsel in the Office of the Corporation Counsel of the City of New York assigned to the defense of the above-referenced matter. I write in accordance with Your Honor's Order of April 24, 2019, to respectfully request that the Joint Pre-Trial Order in this matter be amended to add a single witness and a single document that defendants intend to rely on for their case in chief. Those are: Dr. Herbert Sherry as defendant's expert witness his expert report, dated May 6, 2019 as an exhibit.

To the extent the Court would like an updated copy of the Joint Pre-Trial Order, defendant can provide one by Tuesday, June 4, 2019.¹ Thank you for your attention to this matter.

Respectfully submitted,

/s/

Elissa B. Jacobs
Senior Counsel

cc All counsel (via ECF)

¹ In his letter from earlier this evening, plaintiff notes that he attempted to contact defense counsel regarding an updated joint pre-trial order prior to filing his letter. Counsel notes simply that the e-mail including plaintiff's proposed changes was time-stamped 4:04 p.m. on the date the proposed changes were due, and there were no prior communications between counsel or requests for copies of the "Word" copy of the JPTO.